

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BEVERLY ADKINS, CHARMAINE WILLIAMS, REBECCA PETTWAY, RUBBIE McCOY, and WILLIAM YOUNG, on behalf of themselves and all others similar situated, and MICHIGAN LEGAL SERVICES,

Plaintiffs,

-against-

MORGAN STANLEY, MORGAN STANLEY & CO. LLC, MORGAN STANLEY ABS CAPITAL I INC., MORGAN STANLEY MORTGAGE CAPITAL INC., and MORGAN STANLEY MORTGAGE CAPITAL HOLDINGS LLC,

Defendants.

1:12-CV-7667-VEC-GWG

ORAL ARGUMENT REQUESTED

**DECLARATION OF RACHEL E. GOODMAN IN SUPPORT OF PLAINTIFFS'
REPLY IN SUPPORT OF THEIR MOTION FOR CLASS CERTIFICATION**

I, RACHEL E. GOODMAN, declare:

1. I am a staff attorney at the American Civil Liberties Union Foundation, counsel of record for the proposed class. I am a member in good standing of the Bar of the State of New York, and I am admitted to practice in this Court. I submit this declaration in support of Plaintiffs' Reply in Support of Their Motion for Class Certification. I have personal knowledge of the statements contained in this declaration, and if called upon to testify, I could and would testify competently to them.

2. Attached as Exhibit 1 is a true and correct copy of excerpts of the August 29, 2014, Deposition of Patricia Ann McCoy (pages 14-16, 140, 143-144, 167, 177-178, 293-296).

3. Attached as Exhibit 2 is a true and correct copy of excerpts of the June 30, 2014, Deposition of William McKay (pages 19-22, 23-24, 26, 36, 42-43, 48-54, 66-71, 73-78, 98, 101, 106-114, 129, 131, 170, 175-178, 181-183, 188-191).

4. Attached as Exhibit 3 is a true and correct copy of an excerpt of the June 19, 2014, Deposition of Warren Licata (page 68).

5. Attached as Exhibit 4 is a true and correct copy of the New Century Financial Corporation Current Report (8-K) dated March 7, 2007, filed March 12, 2007.

6. Attached as Exhibit 5 is a true and correct copy of excerpts of the April 2, 2014, Deposition of Patricia Lindsay (pages 28, 41-43, 60, 63, 67-68, 70, 73-76, 84, 94-97, 114-115, 121-122, 138, 187).

7. Attached as Exhibit 6 is a true and correct copy of excerpts of the October 29, 2014, Deposition of Timothy J. Riddiough (pages 73-89, 100-107, 124, 139-150, 161-168, 178, 200-213) and an excerpt from an exhibit to the deposition (Ex. 3, pages 82-84).

8. Attached as Exhibit 7 is a true and correct copy of excerpts of the March 17, 2014, Deposition of Robbie Marie McCoy (pages 84-86).

9. Attached as Exhibit 8 is a true and correct copy of excerpts of the August 22, 2014, Deposition of Ian Ayres (pages 40-43, 46-48, 51, 145-157, 305-306).

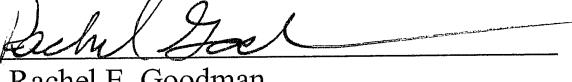
10. Attached as Exhibit 9 is a true and correct copy of excerpts of the November 13, 2014, Deposition of Marsha Courchane (pages 109, 115-117).

11. Attached as Exhibit 10 is a true and correct copy of excerpts of the November 11, 2014, Deposition of Stephen Ryan (pages 64-65, 141, 143-144, 180).

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on November 26, 2014 in New York, NY.

Dated: November 26, 2014

Respectfully submitted,

By: 
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